

Message

From: Lisa Rector [lrector@nescaum.org]
Sent: 3/6/2020 3:31:55 PM
To: Toney, Mike [Toney.Mike@epa.gov]; Johnson, Steffan [johnson.steffan@epa.gov]
Subject: RE: TRIVIA FRIDAY

And actually, your email raises a new question. I believe there used to be an AD for the 1988 rule that said anything below 1.0 kg/hr is okay, didn't need to do the two burns to show it couldn't reach 1.0. New list of questions:

- Does 1988 AD for Cat 1 still apply?
- Can they do two runs at the lowest air setting, use those to show they can't meet the requirement and then use those runs for both Cat 1 and Cat 2 so they can still complete the test with four burns?

Sorry to pester but I want to make sure I understand this all correctly. I can exchange pics of F-35 in return for answered questions 😊

Thanks!

From: Toney, Mike <Toney.Mike@epa.gov>
Sent: Friday, March 6, 2020 10:18 AM
To: Lisa Rector <lrector@nescaum.org>; Johnson, Steffan <johnson.steffan@epa.gov>
Subject: RE: TRIVIA FRIDAY

Hi Lisa,

It is a regulatory requirement both in AAA section 60.534 page 13709 and in QQQQ section 60.5476 page 12722, that the lowest burn rate is no greater than the operator can achieve at home and no greater than advertised by the manufacturer. That said in appendix A-8 page 13728 states in procedures to use the burn rates in EPA Method 28 for 28R testing using ASTM 2780. So yes, the below .80 kg/hr burn rate must be met, and met to the extent that it is the lowest that the heater can burn. If a heater tests a low burn at .70 kg/hr it meets the below .80 and if this is the lowest it can burn it meets the lowest criteria also. The manufacturer cannot advertise any burn rate lower than this.

I know what you are getting at! The other scenario is if a device cannot burn below .80 kg/hr. What should be done. Fall back to Method 28 section 8.1.1.3.2 conduct two tests to prove this is the case and then perform one test where the average burn rate is 1.0 kg/hr or less (.81 to 1.0 kg/hr) will suffice for the low burn.

Happy Friday

From: Lisa Rector [mailto:lrector@nescaum.org]
Sent: Friday, March 06, 2020 8:22 AM
To: Toney, Mike <Toney.Mike@epa.gov>; Johnson, Steffan <johnson.steffan@epa.gov>
Subject: TRIVIA FRIDAY

HAPPY FRIDAY!!!! Question of the day:

1. For stoves testing with US EPA M28R for Step 2 certification under 2015 NSPS in Category1, do they:
 - a. need to test at the lowest air setting
 - b. have a burn rate of less than 1.0 kg/hr

We are trying to understand which applies with M28R stoves in Cat 1: a, b or a&b